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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF MOTIONS TO BE HEARD
AT MAY 22, 2019 OMNIBUS HEARING**

Date: May 22, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline: May 15, 2019
4:00 p.m. (Pacific Time)

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E
2 Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and
3 debtors in possession (the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11**
4 **Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States
Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Northern District
of California (San Francisco Division) (the “**Bankruptcy Court**”).

5 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
6 **May 22, 2019, at 9:30 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) in the courtroom of the
7 Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden
Gate Avenue, San Francisco, California 94102.

8 **PLEASE TAKE FURTHER NOTICE** that, in addition to matters previously scheduled for
9 the Omnibus Hearing, the Bankruptcy Court will hear the following motions and applications listed
below (collectively, the “**Motions**”), which the Debtors filed on May 1, 2019.

10 **MOTIONS TO BE CONSIDERED AT THE OMNIBUS HEARING**

11 1. **Wildfire Assistance Program Motion.** *Motion Pursuant to 11 U.S.C. §§ 105(a) and*
12 *363(b) and Fed. Bankr. P. 2002 and 6004(h) for an Order (a) Authorizing Debtors to Establish and*
13 *Fund Program to Assist Wildfire Claimants with Alternative Living Expenses and Other Urgent*
Needs and (b) Granting Related Relief [Dkt No. 1777].

14 2. **Bar Date Motion.** *Motion of Debtors Pursuant to 11 U.S.C. §§ 502(b)(9) and 105(a),*
15 *Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1 for Order (I) Establishing*
16 *Deadline for Filing Proofs of Claim, (II) Establishing the Form and Manner of Notice Thereof, and*
(III) Approving Procedures for Providing Notice of Bar Date and Other Information to Creditors
and Potential Creditors [Dkt No. 1784].

17 3. **MOR Deadlines and Form Modification Application.** *Application Pursuant to*
18 *L.B.R. 2015-2(e) and 11 U.S.C. § 105(a) for an Order Modifying Debtors’ Deadlines for Filing*
19 *Monthly Operating Reports and Approving Proposed Modifications to Form of Monthly Operating*
Reports [Dkt No. 1788].

20 4. **PwC Retention Application.** *Application Pursuant to 11 U.S.C. §§ 327(a) and*
21 *328(a) and Fed. R. Bankr. P. 2014(a) and 2016 for Authority to Retain and Employ*
22 *PricewaterhouseCoopers LLP as Management, Tax, and Advisory Consultants to the Debtors Nunc*
Pro Tunc to Petition Date [Dkt No. 1791].

23 5. **Exclusivity Motion.** *Corrected Motion of Debtors Pursuant to 11 U.S.C. § 1121(d)*
24 *to Extend Exclusive Periods* [Dkt No. 1797].

25 6. **Lease Extension Motion.** *Motion of Debtors for Entry of Order Pursuant to 11*
26 *U.S.C. § 365(d)(4) and B.L.R. 6006-1 Extending Time to Assume or Reject Unexpired Leases of*
Nonresidential Real Property [Dkt No. 1805].

27 **PLEASE TAKE FURTHER NOTICE** that, concurrently with the PwC Retention
28 Application, the Debtors filed a motion seeking authority to file with certain limited redactions
certain exhibits filed in support of the PwC Retention Application that contain confidential

1 commercial information [Dkt. No. 1793]. The Debtors propose to share unredacted copies of these
2 documents with (i) the Office of the United States Trustee on a strictly confidential basis and (ii)
3 counsel and financial advisors to the Official Committee of Unsecured Creditors and the Official
Committee of Tort Claimants on a strictly confidential and “professionals’ eyes only” basis.

4 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motions
5 must be in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtors at the
6 above-referenced addresses so as to be received by no later than **4:00 p.m. (Pacific Time) on May**
7 **15, 2019**. Any oppositions or responses must be filed and served on all “Standard Parties” as
8 defined in, and in accordance with, the *Amended Order Implementing Certain Notice and Case*
9 *Management Procedures* entered on March 27, 2019 [Dkt No. 1093] (“**Case Management Order**”).
Any relief requested in the Motions may be granted without a hearing if no opposition is timely
10 filed and served in accordance with the Case Management Order. In deciding the Motions, the
11 Court may consider any other document filed in these Chapter 11 Cases and related Adversary
12 Proceedings.

13 **PLEASE TAKE FURTHER NOTICE** that copies of each pleading and other documents
14 identified herein can be viewed and/or obtained: (i) by accessing the Court’s website at
15 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
16 Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtors’ notice and claims agent, Prime
17 Clerk LLC , at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for
18 U.S.-based parties; or +1 (929) 333-8977 for international parties or by e-mail at:
19 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
20 Bankruptcy Court’s website.

21 Dated: May 1, 2019

22 **WEIL, GOTSHAL & MANGES LLP**

23 **KELLER & BENVENUTTI LLP**

24 /s/ Jane Kim

25 Jane Kim

26 *Attorneys for Debtors and Debtors in Possession*